

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

TRACEY DAMRAU, et al.	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 4:24-cv-01441
	)	
COLIBRI GROUP, INC.	)	
	)	
Defendant.	)	
	)	
	)	

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendant Colibri Group, LLC (“Defendant”), respectfully request a thirty day extension of time for Defendant to file its Response to Plaintiffs’ Complaint. In support of its Motion, Defendant states:

1. Plaintiffs filed their Complaint on October 25, 2024. (Dkt #1).
2. Defendant was served on October 29, 2024.
3. Pursuant to the Federal Rules of Civil Procedure, Defendant must file a response to the Complaint by November 19, 2024. *See* Fed. R. Civ. P. 12(a).
4. Undersigned counsel was recently retained to represent Defendant in this matter, are still reviewing the Complaint and materials referenced in the Complaint, and have various deadlines through early December requiring their attention. Defendant therefore requests a thirty day extension of time to respond to the Complaint, making the new deadline December 19, 2024.
5. This is Defendant’s first request for an extension of time. This Motion is made in good faith and with no intent of delaying this matter.

6. Counsel for Plaintiffs consents to this request.

7. No party will be prejudiced if the Court grants this request. As no Case Management Order has yet been entered, granting this Motion will not affect any other deadlines in this case.

WHEREFORE, Defendant respectfully requests that this Court grant it an extension of time, up to and including December 19, 2024, to file its response to the Complaint.

Dated: November 12, 2024

**ARMSTRONG TEASDALE LLP**

By: /s/ Paul Croker  
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*Counsel for Defendant Colibri Group, LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 12, 2024, the foregoing was filed electronically using the Court's CM/ECF system which will serve a copy upon all parties of record.

/s/ Paul Croker